

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Pacific Packaging Products, Inc.

Plaintiff

v.

Baldwin & Clarke,

Jefferson Pilot Securities Corp.,

Benefit Strategies, LLC,

Michael J. Kennedy, and

Scott D. LaValley

Defendants

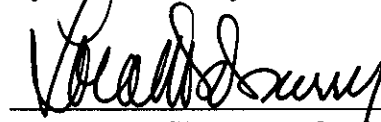
Civil Action No.: 04-CV-11102MLW

**MOTION OF PLAINTIFF TO EXTEND TIME TO RESPOND
TO MOTION OF THE DEFENDANTS, BALDWIN & CLARKE,
JEFFERSON PILOT SECURITIES CORP., MICHAEL J. KENNEDY
AND SCOTT D. LAVALLEY TO DISMISS**

Now comes the Plaintiff, Pacific Packaging Products, Inc., and requests this Court grant it an extension of time to respond to the Motion to Dismiss filed by the Defendants up to and including June 24, 2004. As a basis, the Plaintiff states that the parties are in the process of exploring resolution of this matter.

Dated: May 28, 2004

Respectfully Submitted,
Pacific Packaging Products, Inc.
By Their Attorneys,



Lora M. McSherry, BBO# 551695

Herbert P. Phillips, BBO# 398420

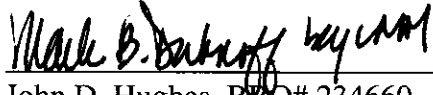
Phillips, Gerstein, Holber & Channen, LLP

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(978) 374-1131

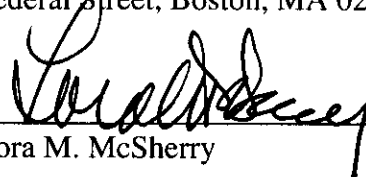
Assented to by the Attorneys for
Baldwin & Clarke, Jefferson
Pilot Securities Corp., Michael J.
Kennedy and Scott D. LaValley



John D. Hughes, BBO# 234660
Mark B. Dubnoff, BBO# 637212
Edwards & Angell, LLP
101 Federal Street
Boston, MA 02110
(617) 439-4444

CERTIFICATE OF SERVICE

I, Lora M. McSherry, hereby certify that on this 28th day of May, 2004, I caused a copy of the foregoing document to be sent by first-class mail, postage prepaid, to Defendant's counsel, Mark B. Dubnoff, Edwards & Angell, LLP, 101 Federal Street, Boston, MA 02110.


Lora M. McSherry